

Exhibit 19-3
Citizen Participation Plan

6509.2 REV-5

| Guide for Review of Local Government Citizen Participation Plan Performance | | | |
|------------------------------------------------------------------------------------|--|--------------|--|
| Name of Program Participant: | | | |
| Staff Consulted: | | | |
| Date Plan Was Adopted or Last Amended: | | | |
| Name(s) of Reviewer(s): | | Date: | |

NOTE: All questions that address requirements contain the citation for the source of the requirement (statute, regulation, NOFA, or grant agreement). If the requirement is not met, HUD must make a finding of noncompliance. All other questions (questions that do not contain the citation for the requirement) do not address requirements, but are included to assist the reviewer in understanding the participant's program more fully and/or to identify issues that, if not properly addressed, could result in deficient performance. Negative conclusions to these questions may result in a "concern" being raised, but not a "**finding**."

Instructions: This Exhibit is designed to review the program participant's citizen participation performance to ascertain whether the unit of local government is following its Citizen Participation Plan as required at 24 CFR 91.105 of the Consolidated Plan regulations. The Exhibit is divided into seven sections: Development of the Citizen Participation Plan and Any Amendments; Development of the Consolidated Plan; Consolidated Plan Amendments; Performance Reports; Public Hearings; Miscellaneous Citizen Participation Requirements; and Following the Citizen Participation Plan.

Questions:

A. DEVELOPMENT OF THE CITIZEN PARTICIPATION PLAN AND ANY AMENDMENTS

1.

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| Did citizens have an opportunity to comment on the original Citizen Participation Plan or on any substantial amendment(s) to it? [24 CFR 91.105(a)(3)] | <input type="checkbox"/> <input type="checkbox"/> Yes No |
| Describe Basis for Conclusion: <div style="height: 150px; border: 1px solid black;"></div> | |

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| <p>Did the local government provide the Citizen Participation Plan in a format accessible to persons with disabilities, upon request (e.g., providing an oral, Braille, electronic, or large print copy for the visually impaired; or delivering a copy to a homebound person)? [Note: If the Plan is available online, its format must be compatible with web readers for the visually impaired, as required by 24 CFR Part 8.]</p> <p>[24 CFR 91.105(a)(3)]</p> | <div style="display: flex; justify-content: space-around;"> <div style="text-align: center;"> <input type="checkbox"/> Yes </div> <div style="text-align: center;"> <input type="checkbox"/> No </div> </div> |
| <p>Describe Basis for Conclusion:</p> | |

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| <p>Was the opportunity provided to comment on the original Citizen Participation Plan or on a substantial amendment to this Plan not clearly unreasonable? (A “no” conclusion would be the basis of the finding that the local government did not provide a reasonable opportunity to comment.) [24 CFR 91.105(a)(3)]</p> | <div style="display: flex; justify-content: space-around;"> <div style="text-align: center;"> <input type="checkbox"/> Yes </div> <div style="text-align: center;"> <input type="checkbox"/> No </div> </div> |
| <p>Describe Basis for Conclusion:</p> <div style="border: 1px solid black; height: 850px; width: 100%;"></div> | |

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| Was the Citizen Participation Plan made available to the public? [24 CFR 91.105(a)(3)] | <input type="checkbox"/> | <input type="checkbox"/> |
| | Yes | No |
| Describe Basis for Conclusion: | | |
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B. DEVELOPMENT OF THE CONSOLIDATED PLAN

5.

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| Before the local government adopted its Consolidated Plan, did the local government make available (in accordance with its Citizen Participation Plan) to citizens, public agencies, and other interested parties information that included: <ul style="list-style-type: none">• the amount of assistance the local government expected to receive (including grant funds and program income);• the range of activities that may be undertaken;• the estimated amount of funding that will benefit persons of low- and moderate-income;• the local government's plans to minimize displacement of persons and to assist any persons displaced, specifying the types and levels of assistance the local government will make available (or require others to make available) to persons displaced, even if the local government expects no displacement to occur; and• when and how the local government will make this information available? | <input type="checkbox"/> Yes | <input type="checkbox"/> No |
| Describe Basis for Conclusion: | | |

6.

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| Did the local government publish the proposed Consolidated Plan in accordance with the Citizen Participation Plan and in a manner that afforded citizens, public agencies, and other interested parties a reasonable opportunity to examine its contents and to submit comments? | <input type="checkbox"/> Yes | <input type="checkbox"/> No |
| Describe Basis for Conclusion: | | |

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7.

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| If Citizen Participation Plan states the local government will publish a summary of the proposed Consolidated Plan, does the summary include: <ul style="list-style-type: none">• a description of the contents and purpose of the Consolidated Plan; and• a list of the locations where copies of the entire proposed Consolidated Plan may be examined? | <table><tr><td><input type="checkbox"/></td><td><input type="checkbox"/></td><td><input type="checkbox"/></td></tr><tr><td>Yes</td><td>No</td><td>N/A</td></tr></table> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | Yes | No | N/A |
| <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | | | | | |
| Yes | No | N/A | | | | | |
| Describe Basis for Conclusion: | | | | | | | |

8.

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| Did the local government provide a reasonable number of free copies of the Consolidated Plan to citizens and groups that requested it? | <table><tr><td><input type="checkbox"/></td><td><input type="checkbox"/></td></tr><tr><td>Yes</td><td>No</td></tr></table> | <input type="checkbox"/> | <input type="checkbox"/> | Yes | No |
| <input type="checkbox"/> | <input type="checkbox"/> | | | | |
| Yes | No | | | | |
| Describe Basis for Conclusion: | | | | | |

9.

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|-------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------|--------------------------|--------------------------|------------|-----------|
| Did the local government hold at least one public hearing (as set forth in its Citizen Participation Plan) during the development of the Consolidated Plan? | <table><tr><td><input type="checkbox"/></td><td><input type="checkbox"/></td></tr><tr><td>Yes</td><td>No</td></tr></table> | <input type="checkbox"/> | <input type="checkbox"/> | Yes | No |
| <input type="checkbox"/> | <input type="checkbox"/> | | | | |
| Yes | No | | | | |
| Describe Basis for Conclusion: | | | | | |

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10.

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| Did the local government provide the period specified in its Citizen Participation Plan (of not less than 30 days) to receive comments from citizens on the Consolidated Plan? | <input type="checkbox"/> Yes | <input type="checkbox"/> No |
| Describe Basis for Conclusion: | | |

11.

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| Did the local government consider any comments or views of citizens received in writing, or orally at the public hearings, in preparing the final Consolidated Plan? | <input type="checkbox"/> Yes | <input type="checkbox"/> No |
| Describe Basis for Conclusion: | | |

12.

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| Did the local government take the actions described in the Citizen Participation Plan to encourage participation by residents of public and assisted housing and by other low- income residents of targeted revitalization areas in which public and assisted housing is located in developing and implementing the Consolidated Plan? | <input type="checkbox"/> Yes | <input type="checkbox"/> No |
| Describe Basis for Conclusion: | | |

13.

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| Did the local government take the actions described in the Citizen Participation Plan to provide for and encourage citizens to participate in the development of the Consolidated Plan? | <input type="checkbox"/> Yes | <input type="checkbox"/> No |
| Describe Basis for Conclusion: | | |

C. CONSOLIDATED PLAN AMENDMENTS

14.

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| For each Consolidated Plan amendment, did the local government apply the criteria described in the Citizen Participation Plan to determine what changes in the local government's planned or actual activities constitute a substantial amendment to the Consolidated Plan? | <input type="checkbox"/> Yes | <input type="checkbox"/> No | <input type="checkbox"/> N/A |
| Describe Basis for Conclusion: | | | |

15.

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| a. Were citizens given notice and an opportunity to comment on substantial amendments to the Consolidated Plan in accordance with the Citizen Participation Plan? | <input type="checkbox"/> Yes | <input type="checkbox"/> No | <input type="checkbox"/> N/A |
| Describe Basis for Conclusion: | | | |
| b. Did the local government provide the period specified in its Citizen Participation Plan (of not less than 30 days) to receive comments on any substantial amendments to the Consolidated Plan before such amendments were implemented? | <input type="checkbox"/> Yes | <input type="checkbox"/> No | <input type="checkbox"/> N/A |
| Describe Basis for Conclusion: | | | |

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16.

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|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------|--------------------------|--------------------------|
| Did the local government consider any comments or views of citizens received in writing, or orally at the public hearings, in preparing substantial amendments to the Consolidated Plan? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| | Yes | No | N/A |
| Describe Basis for Conclusion: | | | |
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17.

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| Did the local government take the actions described in the Citizen Participation Plan to provide for and encourage citizens to participate in the development of any substantial amendments to the Consolidated Plan? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| | Yes | No | N/A |
| Describe Basis for Conclusion: | | | |
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D. PERFORMANCE REPORTS

18.

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| Did the local government take the actions described in the Citizen Participation Plan to give citizens notice and an opportunity to comment on performance reports? | <input type="checkbox"/> | <input type="checkbox"/> |
| | Yes | No |
| Describe Basis for Conclusion: | | |
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19.

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| Did the local government provide a period of not less than 15 days to receive comments on performance reports before the reports were submitted to HUD? | <input type="checkbox"/> | <input type="checkbox"/> |
| | Yes | No |
| Describe Basis for Conclusion: | | |

20.

| | | |
|-----------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------|--------------------------|
| Did the local government consider any comments or views of citizens received in writing, or orally at the public hearings, in preparing the performance report? | <input type="checkbox"/> | <input type="checkbox"/> |
| | Yes | No |
| Describe Basis for Conclusion: | | |

21.

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| Did the local government take the actions described in the Citizen Participation Plan to provide for and encourage citizens to participate in the development of the performance report? | <input type="checkbox"/> | <input type="checkbox"/> |
| | Yes | No |
| Describe Basis for Conclusion: | | |

E. PUBLIC HEARINGS

22.

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|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------|---------------------------------------|
| Did the local government hold two or more public hearings per year (as set forth in its Citizen Participation Plan) to obtain citizens' views and to respond to proposals and questions? | <input type="checkbox"/> Yes | <input type="checkbox"/> No |
| Describe Basis for Conclusion: | | |

23.

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| a. Were the hearings conducted at a minimum of two different stages of the program year? | <input type="checkbox"/> Yes | <input type="checkbox"/> No |
| Describe Basis for Conclusion: | | |
| b. Was at least one of these hearings held before the proposed Consolidated Plan was published for comment? | <input type="checkbox"/> Yes | <input type="checkbox"/> No |
| Describe Basis for Conclusion: | | |

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24.

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| Did the hearings, together, address: a) housing and community development needs, b) development of proposed activities, and c) review of program performance? | <input type="checkbox"/> Yes | <input type="checkbox"/> No |
| Describe Basis for Conclusion: <div style="height: 100px; border: 1px solid black;"></div> | | |

25.

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| Did the local government take the actions described in the Citizen Participation Plan to provide adequate notice to citizens of each hearing? | <input type="checkbox"/> Yes | <input type="checkbox"/> No |
| Describe Basis for Conclusion: <div style="height: 100px; border: 1px solid black;"></div> | | |

26.

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| Did the local government publish sufficient information about the subject of each hearing to permit informed comment? (Note: Publishing small print notices in the newspaper a few days before the hearing does not constitute adequate notice. Although HUD does not specify the length of notice required, two weeks is considered adequate.) | <input type="checkbox"/> Yes | <input type="checkbox"/> No |
| Describe Basis for Conclusion: <div style="height: 100px; border: 1px solid black;"></div> | | |

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27.

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| a. Were hearings held at times and locations convenient to potential and actual beneficiaries? | <input type="checkbox"/> | <input type="checkbox"/> |
| | Yes | No |
| Describe Basis for Conclusion: | | |
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|-------------------------------------------------------------------------|--------------------------|--------------------------|
| b. Were hearings held with accommodation for persons with disabilities? | <input type="checkbox"/> | <input type="checkbox"/> |
| | Yes | No |
| Describe Basis for Conclusion: | | |
| | | |

28.

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| Did the local government meet the needs of non-English speaking residents in the case of public hearings where a significant number of non-English speaking residents were expected to participate? | <input type="checkbox"/> | <input type="checkbox"/> |
| | Yes | No |
| Describe Basis for Conclusion: | | |
| | | |

F. MISCELLANEOUS CITIZEN PARTICIPATION REQUIREMENTS

29.

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|-------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------|--------------------------|
| Did the local government provide (as set forth in its Citizen Participation Plan) citizens with reasonable and timely access to local meetings? | <input type="checkbox"/> | <input type="checkbox"/> |
| | Yes | No |
| Describe Basis for Conclusion: | | |
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30.

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|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------|--------------------------------|
| Did the local government make the Consolidated Plan, as adopted, substantial amendments, and the performance report available to the public, including the availability of materials in a form accessible to persons with disabilities, upon request? | <input type="checkbox"/> Yes | <input type="checkbox"/> No |
| Describe Basis for Conclusion: | | |

31.

| | | |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------|--------------------------------|
| Did the local government provide(as set forth in its Citizen Participation Plan) citizens, public agencies, and other interested parties with reasonable and timely access to information and records relating to the local government's Consolidated Plan and the local government's use of assistance under the programs covered in the Consolidated Plan during the preceding five years? | <input type="checkbox"/> Yes | <input type="checkbox"/> No |
| Describe Basis for Conclusion: | | |

32.

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| Did the local government provide (as set forth in its Citizen Participation Plan) technical assistance to groups representative of persons of low- and moderate-income that requested help in developing proposals for funding assistance under any of the programs covered by the Consolidated Plan? (Note: The assistance need not include the provision of funds to the groups.) | <input type="checkbox"/> Yes | <input type="checkbox"/> No |
| Describe Basis for Conclusion: | | |

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33.

| | | |
|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------|---------------------------------------|
| Did the local government follow the procedures described in the Citizen Participation Plan to handle complaints from citizens related to the Consolidated Plan, amendments, and the performance report? | <input type="checkbox"/> Yes | <input type="checkbox"/> No |
| Describe Basis for Conclusion: | | |

34.

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| For the CDBG program only, did the local government respond to written citizen complaints “within 15 working days, where practicable?” | <input type="checkbox"/> Yes | <input type="checkbox"/> No | <input type="checkbox"/> N/A |
| Describe Basis for Conclusion: | | | |

G. FOLLOWING THE CITIZEN PARTICIPATION PLAN

35.

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| Based on the review documented above, did the local government follow its Citizen Participation Plan? [24 CFR 91.105(k)] | <input type="checkbox"/> Yes | <input type="checkbox"/> No |
| Describe Basis for Conclusion: | | |